

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

PLYMOUTH COUNTY RETIREMENT  
SYSTEM, Individually and On Behalf of All  
Others Similarly Situated,

Plaintiff,

v.

GTT COMMUNICATIONS, INC.,  
RICHARD D. CALDER, JR., CHRIS  
MCKEE, and MICHAEL SICOLI,

Defendants

Case No. 1:19-cv-00982-CMH-MSN

CLASS ACTION

**NORFOLK COUNTY RETIREMENT SYSTEM'S NON-OPPOSITION TO  
COMPETING MOTIONS FOR APPOINTMENT AS LEAD PLAINTIFF AND  
APPROVAL OF SELECTION OF LEAD COUNSEL**

Proposed Lead Plaintiff Norfolk County Retirement System (“Norfolk”) respectfully submits this non-opposition with respect to the pending motions for appointment as Lead Plaintiff and approval of selection of Lead Counsel in the above-captioned securities class action (the “Action”).

On September 30, 2019, Norfolk filed a motion for appointment as Lead Plaintiff and approval of selection of Lead Counsel for the Class. *See* ECF No. 13. Based upon a review of the motions and supporting documentation provided by the other movants seeking appointment as Lead Plaintiff, it appears that Norfolk does not possess the “largest financial interest in the relief sought by the class,” as required by the Private Securities Litigation Reform Act of 1995. 15 U.S.C. § 78u-4(a)(3)(B)(iii)(I)(bb).

Were the Court to determine, however, that the other movants seeking appointment as Lead Plaintiff are incapable or inadequate to represent the Class in this litigation, Norfolk stands ready, willing, and able to serve as Lead Plaintiff in the Action. Norfolk reserves any and all rights to participate in any recovery in the Action.

Dated: October 15, 2019

Respectfully submitted,

/s/ Susan R. Podolsky

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*Counsel for Proposed Lead Plaintiff Norfolk  
County Retirement System and Proposed Lead  
Counsel for the Class*

**CERTIFICATE OF SERVICE**

I certify that on this 15th day of October, 2019, I electronically filed this Non-Opposition of Norfolk County Retirement System using the Court's CM/ECF system, and the Non-Opposition will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Susan R. Podolsky

Susan R. Podolsky